

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

NORTHERN CHEYENNE TRIBE, *et al.*,

Plaintiffs,

vs.

RYAN ZINKE, *et al.*,

Defendants,

SAFARI CLUB INTERNATIONAL and
NATIONAL RIFLE ASSOCIATION OF
AMERICA,

Defendant-Intervenor
Applicants.

CV 17-00119-DLC

DECLARATION OF CHRIS W. COX

I, Chris W. Cox, being first duly sworn on oath depose and state as follows:

1. I am the Executive Director of the National Rifle Association of America's Institute for Legislative Action. I have held this position since 2002.
2. I am authorized to speak for and represent the National Rifle Association of America in litigation under the bylaws of the National Rifle Association of America.
3. I have personal knowledge of the matters set forth herein, except those stated on information and belief, as to those matters, I believe them to be true.
4. The National Rifle Association of America is an Internal Revenue Code Section 501(c)(4) nonprofit membership organization, incorporated in the state of New York in 1871, with its principal place of business in Fairfax Virginia.


5. The National Rifle Association of America currently has approximately 5,000,000 individual members, many of whom reside in and around the Greater Yellowstone Ecosystem in Idaho, Montana, and Wyoming.
6. Among the National Rifle Association of America's purposes and objectives are, "[t]o promote hunter safety, and to promote and defend hunting as a shooting sport and as a viable and necessary method of fostering the propagation, growth and conservation of our renewable wildlife resources." National Rifle Association of America Bylaws Article II Section 5.
7. The National Rifle Association of America and its members support sustainable use conservation, and are dedicated to protecting, promoting, and preserving America's hunting heritage for the common good, and general welfare of the public.
8. The National Rifle Association of America has: a Director of Conservation, Wildlife, and Natural Resources; and a Hunter Services Division working at its headquarters in Fairfax, Virginia. They are responsible for promoting the interests of the hunting community in wildlife management. In addition, they work to ensure that wildlife populations continue to be available to be enjoyed by National Rifle Association of America members, and to protect and sustain hunting in support of wildlife conservation.
9. The National Rifle Association of America's Director of Conservation, Wildlife, and Natural Resources serves as the Chair to the Federal Lands, Hunting, Fishing, and Shooting Sports Roundtable ("the Roundtable"). The Roundtable was created by a Memorandum of Understanding signed by the U.S. Army Corps of Engineers, U.S. Forest Service, the U.S. Bureau of Land Management, the U.S. Fish and Wildlife Service, and 42 private hunting and conservation organizations, including the National Rifle Association of America. The Roundtable's primary purpose "is to develop and expand a framework ... for planning and implementing mutually beneficial projects and activities related to hunting, fishing, and shooting sports conducted on federal lands." *See* Memorandum of Understanding for Federal Lands Hunting, Fishing, and Shooting Sports Roundtable, at *2.
10. The National Rifle Association of America has been instrumental in the passage of virtually every significant piece of hunting and wildlife-conservation legislation throughout the nation over the last 30 years including: protecting hunters from harassment in the field; protecting, and

expanding hunting seasons; promoting right-to-hunt amendments to many state constitutions; and fighting to keep areas open to hunting.

11. The National Rifle Association of America and its members are confident that because of the recovered status of grizzly bears, the species no longer requires federal Endangered Species Act protection and that state management authorities, not the federal government, should now have the ability to manage this recovered species.
12. On information and belief, The National Rifle Association of America has many members who hunt in the Greater Yellowstone Ecosystem.
13. On information and belief, many NRA members would participate in a grizzly bear hunt in the Greater Yellowstone Ecosystem, if given the opportunity.
14. If the plaintiffs in this litigation succeed, those NRA members who would hunt a grizzly bear in the Greater Yellowstone Ecosystem will be deprived of that opportunity.
15. I provide this declaration in support of Safari Club International and the National Rifle Association of America's motion to intervene in the above captioned case.

In accordance with 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 31st day of October 2017.



Chris W. Cox